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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Sherri Lynne Love,

Petitioner,

v.

State of Nevada, et al.,

Respondents.

Case No. 2:17-cv-02419-JAD-PAL

**Stipulation to extend time to file  
the first amended petition**

**(First stipulation)  
(Sixth request for extension)**

ECF Nos. 16, 17

The parties hereby stipulate to a 45-day extension of time for Ms. Love to file her first amended petition or other related pleading, up to and including November 26, 2018. Ms. Love's counsel represents there are ongoing negotiations between Ms. Love and the Clark County District Attorney's office, on behalf of the State of Nevada, which may result in a possible alternative resolution of this case. The

1 current deadline for the amended petition is October 12, 2018.<sup>1</sup> Ms. Love has moved  
2 for five extensions to date.<sup>2</sup> Now, the parties stipulate to another 45-day extension.

3 Ms. Love's counsel represents that her first amended petition is complete and  
4 ready to be filed. However, Ms. Love has agreed to withhold filing the petition—  
5 with this Court's permission—unless and until negotiations fail to resolve the case.

6 Ms. Love's counsel submits that 45 days is the minimum time necessary to  
7 allow the parties to complete the negotiation process and, if negotiations result in a  
8 resolution of this case, to finalize the additional steps necessary to officially resolve  
9 the matter. If 45-days proves insufficient time, the parties will provide a status  
10 update to the court on this matter on November 26, 2018.

11 However, in the event that negotiations do not result in a resolution of this  
12 case, Ms. Love will promptly file her amended petition upon termination of  
13 negotiations.

14 The parties agree that this stipulation does not waive any procedural  
15 defenses or statute-of-limitations challenges that respondents may raise in this  
16 case. The parties also agree that this stipulation does not constitute respondents'  
17 agreement with any of Ms. Love's representations in this or any other court filing.

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26       <sup>1</sup> The court has not ruled on the most recent motion for extension. ECF No. 16.  
27       If the court were to grant it, the deadline would be October 12, 2018.

2       <sup>2</sup> Love's fourth and fifth requests for extension are also related to the discovery  
of new evidence and the possible resolution of this case.

Therefore, if this court approves this stipulation, the deadline for Ms. Love to file her first amended petition is extended up to and including November 26, 2018. Alternatively, if negotiations are still ongoing, the parties will provide this court with a status update on November 26, 2018. If negotiations terminate without agreement, Ms. Love will promptly file her amended petition, without delay.

Dated October 12, 2018.

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

/s/ S. Alex Spelman  
S. Alex Spelman (Bar No. 14278)  
Assistant Federal Public Defender  
For Petitioner

ADAM PAUL LAXALT  
Attorney General

/s/ Amanda C. Sage  
AMANDA C. SAGE (Bar No. 13429)  
Deputy Attorney General  
For Respondents

## ORDER

IT IS SO ORDERED; the deadline for petitioner to file her First Amended Petition is extended *nunc pro tunc* to 11/26/18. IT IS FURTHER ORDERED that petitioner's motion for a fifth extension of this deadline [ECF No. 16] is GRANTED *nunc pro tunc* to 9/12/18.

U.S. District Judge Jennifer A. Dorsey  
Dated: October 15, 2018